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Attorneys for the Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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ISIDRA B. TUBURAN, ROSALINA D. QUILARIO,
and GWENDOLEN ALMONTE.

Plaintiffs,

Dkt. No. 12-cv-8561 (NRB)

- against -

RAINAS MASSEY and CARE WORLDWIDE, INC.,

ANSWER TO COUNTER-
CLAIMS

Defendants.

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Plaintiffs ISIDRA B. TUBURAN, ROSALINA D. QUILARIO, and
GWENDOLEN ALMONTE, by undersigned counsel, respectfully respond to
Defendants' counterclaims as follows:

309. The allegations in paragraph 309 are declaratory in nature and do not call
for a response. To the extent a response is required, the Plaintiffs deny.

310. Plaintiffs admit that Defendant Massey is the president of Defendant Care
World, but are without sufficient information to admit or deny the rest of the material
allegations contained in paragraph 310.

311. Plaintiffs admit the allegations contained in the first sentence of paragraph
311, but do not have sufficient information to admit or deny the allegations contained in
the second paragraph thereof.

312. Plaintiffs admit that Defendant Care Worldwide "purports" to be a clinical research organization and healthcare company, but deny the material allegations contained in paragraph 312.

313. Plaintiffs are without sufficient information to admit or deny the allegations contained in paragraph 313.

314. Plaintiffs deny the material allegations contained in paragraph 314.

315. Plaintiffs are without sufficient information to admit or deny the allegations contained in the first two sentences of paragraph 315. Plaintiffs deny the allegations contained in the third sentence of paragraph 315.

316. Plaintiffs deny the allegations contained in the paragraph 316.

317. Plaintiffs are without sufficient information to admit or deny the allegations contained in paragraph 317.

318. Plaintiffs are without sufficient information to admit or deny the allegations contained in paragraph 318.

319. Plaintiffs deny the allegations contained in paragraph 319.

320. Plaintiffs deny the allegations contained in paragraph 320.

321. Plaintiffs deny the allegations contained in paragraph 321.

322. Plaintiffs deny all the allegations contained in paragraph 322, including subparagraphs a, b, and c.

323. Plaintiffs deny the allegations contained in paragraph 323.

324. The allegations in paragraph 324 are declaratory in nature and do not call for a response. To the extent a response is required, the Plaintiffs deny.

325. Plaintiffs deny the allegations contained in paragraph 325.

326. Plaintiffs deny the allegations contained in paragraph 326.

327. Plaintiffs deny the allegations contained in paragraph 327.

328. Plaintiffs deny all the allegations contained in paragraph 328, including subparagraphs a, b, and c.

329. Plaintiffs deny the allegations contained in paragraph 329.

330. The allegations in paragraph 330 are declaratory in nature and do not call for a response. To the extent a response is required, the Plaintiffs deny.

331. Plaintiffs admit that Plaintiffs Quilaro and Almonte were interviewed on or about December 26, 2012 by Balitang America, but deny all the material allegations contained in paragraph 331.

332. Plaintiffs deny the allegations contained in paragraph 332.

333. Plaintiffs deny the allegations of contained in paragraph 333.

334. Plaintiffs deny the allegations contained in paragraph 334.

335. Plaintiffs deny all the allegations contained in the "WHEREFORE" clause of Defendants' Answer with Counterclaims.

PRAYER

WHEREFORE, premises considered, it is respectfully prayed that Defendants' counterclaims be dismissed for utter lack of merit.

Dated: February 28, 2013.
Woodside, NY.

Yours, etc.

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